

Program Description Document

MFC HWMA/RCRA TSDF Personnel Training Program



The INL is a U.S. Department of Energy National Laboratory operated by Battelle Energy Alliance.

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1. OVERVIEW OF PERSONNEL TRAINING

MFC TSDF Workers and support personnel participate in a program of classroom instruction and on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of the Idaho Hazardous Waste Management Act (HWMA) which is implemented by the Idaho Administrative Procedures Act (IDAPA) Section 58.01.05 which incorporates "Personnel Training" requirements found in 40 CFR 264.16. This PDD describes the program for training and qualification requirements for personnel who function as TSDF workers or TSDF Support Personnel involved in the operation, maintenance, and technical support of the HWMA/RCRA permitted units within the following MFC facilities:

- Contaminated Equipment Storage (Building 794)
- Hot Fuel Examination Facility (Building 785)
- Radioactive Scrap and Waste Facility (Building 771)
- Sodium Components Maintenance Shop (Buildings 793, 793C, and 793G)
- Sodium Process Facility (Building 799)
- Sodium Storage Building (Building 703).

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2. TRAINING PROGRAM ADMINISTRATION

Pursuant to 40 CFR 264.16(a) (2) the MFC HWMA/RCRA TSDF training program is administered by a person trained in hazardous waste management procedures, and provides instruction relative to hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed.

2.1 TSD Facilities Manager and HFEF Facility Manager

Responsible for the management of TSDF operations within their respective facilities, the TSD Facilities and HFEF Facilities managers administer the training program described in this PDD for their respective facilities. He/she is assisted in this effort by the TSD Staff Specialist (or equivalent), the TSD Shift Supervisor (where applicable), and the MFC Training Manager.

The TSD Facilities and HFEF Facilities managers authorize personnel to work in TSD facilities who complete assigned training programs. Personnel working in these manager's facilities are required to complete appropriate training, and it is the responsibility of the support workers "home organization" to ensure that proper training is received.

The TSD Facilities and HFEF Facilities managers have the additional responsibility of approving the TSDF-specific training materials used to train TSD workers, support workers, and any remedial training programs. All extensions for qualification will be approved by the TSD Facilities and HFEF Facilities managers.

2.2 TSD Facilities Staff Specialist (or Designee)

The TSD Facilities Staff Specialist works with appropriate MFC resources to develop and update training materials and programs that meet the requirements of RCRA and DOE Orders. The TSD Facilities staff specialist may train TSD Operators and Inspectors in the conduct of required inspections of the TSD units.

2.3 TSD/HFEF Facility Shift Supervisor (SS)

The supervisor guides the self study, required reading, and on-the-job training (OJT) of all TSD personnel under their supervision. They can supervise OJT or assign other qualified personnel to provide it.

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2.4 Laboratory and Hot Cell Services Training Manager

The Laboratory and Hot Cells Services (L&HCS) Training Manager, in cooperation with the TSD Facilities Manager and HFEF Facility Manager functions as the Training Director for the HWMA units to direct and maintain the HWMA unit training programs, which includes the analysis, design, development, implementation, and evaluation of training. The Training Manager provides direction on training processes and methods while the TSDF Manager provides training program content that addresses the HWMA/RCRA permit constraints. Together, the L&HCS Training Manager, the TSD Facility Manager, the TSD Facility Staff Specialist, and the HFEF Facility Manager have knowledge of the following:

- Systematic approach to training
- HWMA unit design, systems, operation, and maintenance
- DOE/INL policies and requirements
- DOE Orders
- Hazardous waste/materials waste (HW/MW) facility operations
- American National Standards Institute (ANSI)/American Nuclear Society (ANS) Standards
- Code of Federal Regulations (CFR) as related to hazardous waste management
- Laboratory organization, administration, and management practices (IDAPA 58.01.05.008; 40 CFR 264.16[a]).

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2.5 Training Program Methodology

Pursuant to 40 CFR 264.16 (d)(3), this PDD complies with the requirement that the TSDF owner or operator maintain a written description of the type and amount of both introductory and continuing training that will be given to each person filling position described by this PDD. [From 40 CFR 264.16 (d)(3)]

2.5.1 The INL Competence Commensurate with Responsibilities (CCR) process described in PDD-1004, “Integrated Safety Management System,” represents an integrated Laboratory-wide effort that ensures work is performed safely by qualified workers in accordance with procedures. Application of the INL CCR process ensures that personnel who perform work with significant environmental impacts are properly trained and qualified. PDD-1004 defines the CCR roles and responsibilities for each organization and individual. The CCR process is comprehensive, beginning when a hiring manager and HR personnel write an EPD (Form 325.01, “Employee Position Description”) that identifies job duties, necessary education, and years of experience required for the position. The EPD establishes the basic requirements for each position including education and work experience, as described in Section 4.4.1, “Resources, Roles, Responsibility, and Authority.” Other key elements of the CCR process that support the Environmental Management System are as follows:

- In accordance with Manual 12, “Training and Qualification,” programs are developed using a systematic approach to training (for example, performance based).
- ITPs are prepared in accordance with LWP-12003, “Individual Training Plans.” Each plan clearly defines general, Laboratory-wide, and facility-specific training requirements for the employee. Employees review their EPDs and ITPs annually with their supervisors and make any necessary modifications.
- Per LWP-12033, “Personnel Qualification and Certification,” ITPs also identify necessary employee qualifications or certifications.
- Routine independent- and self-assessments with lessons learned are incorporated as applicable into work processes, management systems, and training programs.

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2.5.2 Classroom/Computer-Based Instruction

Classroom training will be provided by qualified instructors using approved lesson plans. Computer-Based or Web-Based instruction will be reviewed and approved per company requirements and delivered using company delivery systems.

Training will be tracked and documented using the INL Training Records and Information Network (TRAIN) data base. Student attendance is verified and documented through the computer/web-based training program or by signature on attendance sheets. A training file (for example, electronically in the INL TRAIN program) is maintained for each student along with a hard copy of selected exams.

2.5.3 On-the-Job Training

Training that is performed on the job site that consists of initial self-study, discussion of the topic, observation of qualified personnel performing the evolution(s), and supervised hands-on performance of actual or simulated tasks by the trainee.

On-the-job training (OJT) will be conducted by qualified individuals, instructing from approved lesson plans, operating procedures, work control documentation, plan-of-the day rosters, pre-job briefing rosters, etc. and documented on a qualification card, work orders, or briefing forms, as appropriate. Should any item be performed unsatisfactorily, the individual will receive additional instruction and then repeat the task until the instructor is satisfied that the student can perform the task properly. These formal tasks will be listed on a qualification card for the training level being pursued by the student.

The qualification card is designed to allow trainees to independently operate systems, equipment, or perform inspections as they progress through the qualification card provided the identified training requirements have been met and supervisor approval is given. However, full operator qualification only will be granted after all elements of the qualification card are complete and a comprehensive written exam and walkthrough exam are successfully passed.

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2.5.4 Initial RCRA Training

Pursuant to 40 CFR 264.16, facility personnel must successfully complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a manner that ensures the facility's compliance with the regulations. This program must include instruction which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the position in which they are employed. At a minimum, the training program must be designed to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, and emergency systems, including, where applicable:

- Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment
- Key parameters for automatic waste feed cut-off systems
- Communications or alarm systems
- Response to fires or explosions
- Shutdown of operations.

2.5.4.1 Implementing Initial RCRA Training

Facility personnel must successfully complete the program described by 40 CFR 264.16 within six months after the date of their employment or assignment to a HWMA/RCRA facility, or to a new position at a HWMA/RCRA facility. Employees must not work in unsupervised positions until they have completed the initial training requirements.

The HWMA/RCRA training process begins with the facility/organization manager sending an email or interoffice memorandum to the Training Department Manager and the Training Coordinator declaring the date that an employee is selected as a candidate for assignment to the HWMA/RCRA facility.

The Training Coordinator when notified by email or letter of an employee's candidacy for assignment to the HWMA/RCRA facility; enters an administrative form in TRAIN which has a six month expiration date.

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The HWMA/RCRA shift supervisor and instructor uses TRAIN to track the status of the candidate's HWMA/RCRA training completion. After the candidate has successfully completed all the HWMA/RCRA training requirements, the employee can be officially "assigned" to the HWMA/RCRA facility and allowed to work in the facility as needed. Those employees who have completed their training requirements and are officially "assigned" as TSDF workers and support personnel are identified on a monthly basis in a memorandum from the L&HCS Training Manager to applicable facility/organization managers.

Employees who are performing On-The-Job-Training (OJT) under the instruction of a qualified TSDF Worker or Support Worker are not considered to be "working" they are "in training." OJT is conducted in accordance with LWP-9000, Laboratory Excellence Guidance for Training and Qualifications.

Employees who have completed all HWMA/RCRA training requirements are identified in the TRAIN database by "job code." Refer to Table 1. MFC HWMA Unit Training Requirements in this PDD for job codes and training.

2.5.5 **Annual RCRA Training**

After the initial training, TSDF workers and support personnel participate in an annual **RCRA** training review specific to their hazardous waste duties. As identified in the MFC HWMA Unit Permits, only operations personnel (TSDF Org Worker/HFEF TSDF Worker), emergency responders (firefighters), and backshift workers (TSDF Inspector Support Worker) require this annual training.

Refresher training is conducted at any time within a 90-day period before each employee's initial training anniversary.

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2.6 Training Program Content

2.6.1 Required Training Content Areas

Pursuant to IDAPA 58.01.05.008; 40 CFR 264.16[a][2] and [d][3], all TSDF workers and support workers are provided training that is commensurate with the position and TSD-related duties that they are assigned. Table 1 “MFC HWMA Unit Training Requirements” expands on the training matrix found in the MFC HWMA/RCRA permits (PER-116). Table 1 presents training requirements, training frequency, and applicability of training to several categories of TSDF Workers and TSDF Support Workers. Job Codes are identified for the TSDF Worker categories. While not presented in Table 1, each unique TSDF Worker and Support Worker job code are comprised of several qualification codes. The qualification details can be found in the Training Records and Information Network (TRAIN).

In addition, briefings prior to performing work are utilized to ensure that support workers are aware of current facility configuration, hazards, emergency equipment and response to emergencies as applicable. This is accomplished through the briefing process detailed in LWP-9201 as well as the briefing provided as part of the HWMA Facility Specific Training (TSD facility access training) and Qualifications. These qualifications can be found in the INL TRAIN database.

2.6.2 Job Specific Training - TSDF Workers – Operations Personnel (TSD Facility and HFEF Organizations)

Requirements at 40 CFR 264.16(a)(3) are particularly relevant to MFC TSDF Workers – Operations personnel as their job duties involve actual operation of the facility including hands –on management of RCRA/HWMA waste – as compared to the support workers (e.g., maintenance or surveillance personnel). Job-specific training enables facility personnel to respond effectively to emergencies by familiarizing them with day to day facility operations, off-normal events, emergency procedures, emergency equipment, emergency systems, and including, where applicable:

- Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment
- Key parameters for automatic waste feed cut-off systems
- Communications or alarm systems
- Response to fires or explosions
- Shutdown of operations.

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Table 1. MFC HWMA unit training requirements.

Training Requirements	Frequency	TSDF Workers			TSDF Support Workers		
		HFEF TSDF Worker	TSDF Org Worker	Fire Fighter	TSDF Backshift Inspector Support Worker	TSDF EAM	EO, Life Safety Systems, Maint. Tech (Mechanics and I&C Techs), electricians, and Health Physics Technician
		Job Code	Job Code	See PDD-1096, "Fire Department Training," and job code FDFNL0200, MFC Emergency Response Firefighter	Job Code	Job Code	Job Code
		NATDMF0001 HFEF TSDF Worker	NATDMF0003 TSDF Org Worker		NATDMF0002 TSDF Inspector Support Worker	EPEMMF0001 Emergency Action Manager MFC	NATDMF0005 – HPT NATDMF0006 – EO NATDMF0007 – LSSS NATDMF0008 – Mechanics NATDMF0009 – Electricians NATDMF0010 – I&C Technicians NATDMF0011 – RSWF and FCF Aux Bldg Staff Specialist NATDMF0012 – HFEF RCRA Staff Specialist
General Employee Training ¹	Biennial	X	X	X	X	X	X
HWMA Facility Specific Training ³	Biennial	X	X	X	X	X	X
Radiation Work Training	Biennial	X	X	X	X	X	X
Respirator Training	Annual	X	X	X	N/A	N/A	X (HPTs only)
Job-Specific Training ⁴	Variable	X	X	X	X	X	X
HAZWOPER Training	Annual	X	X	X ²	N/A	N/A	N/A

- General Employee Training is comprised of qualification designation QNCONACC – BEA Controlled Area Access
- Firefighters obtain superior qualification by completion of QLFDHZM FD Hazmat Technician qualification
- Facility Specific Training is completion of a RCRA briefing and tour documented on FRM-980 "MFC Facility Access Tour Verification Sheet for the applicable facilities.
- Job-Specific Training varies depending on the audience and usually consists of select position specific training. For example, job specific training for the operator consists of completion of RCRA related portions of operator qualification, where job-specific training for the HPT is completion of INL Rad Con Tech training.

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3. JOB TITLES AND JOB DESCRIPTIONS

RCRA/HWMA TSDF workers and support personnel job classifications and job titles for all positions at the HWMA units have been identified. For the purposes of training, personnel filling these jobs have been grouped into two classifications based on the type of work performed in the units as defined below (IDAPA 58.01.05.008 40 CFR 264.16[d][1] and [2]):

3.1 TSDF Workers

TSDF Workers – both operations staff and emergency response – fire fighter staff perform direct work with waste in the RCRA/HWMA units – as compared to the support workers (e.g., maintenance or surveillance personnel). Job-specific training enables facility personnel to respond effectively to emergencies by familiarizing them with day to day facility operations, off-normal events, emergency procedures, emergency equipment, emergency systems, and including, where applicable:

- Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment,
- Key parameters for automatic waste feed cut-off systems;
- Communications or alarm systems;
- Response to fires or explosions; and
- Shutdown of operations.

NOTE: *Detailed job descriptions (i.e., MFC HWMA unit personnel position descriptions) that include the requisite skill, education, or other qualifications, and duties of personnel assigned to the positions are kept on file in the Human Resources Department.*

3.1.1 Facility Shift Supervisor

- Directs the activities of HWMA unit facility operations technicians during all modes of operation and within applicable operating and maintenance instructions
- Directs day-to-day activities of HWMA unit facility personnel in all modes of operation
- Ensures work assignments are completed per written and oral instructions

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- Provides assistance in troubleshooting and correcting routine operational problems
- Maintains cognizance and monitors of all work in the facility for safety and procedural considerations
- Makes periodic tours of all systems to verify system parameters are normal and equipment is operating properly
- Reviews data sheets and logs to ensure completeness and checks system performance
- Assists in training facility personnel and ensures that technicians/operators remain current on changes to operating and maintenance instructions, administrative procedures, and plant equipment
- Maintains the unit operating record logbook
- Responds immediately to any deficiencies identified on inspection logs and documents corrective action(s)
- Necessary follow-up activities (such as making notifications to ID-Department of Environment Quality, and completing and submitting required reports)
- Briefs support personnel prior to performing work in the TSDF.

3.1.2 Operations Technician/Specialist

- Operates the HWMA unit safely and efficiently under normal and off-normal conditions.
- Maintains level of facility knowledge by compliance with an approved training program.
- Helps in the OJT for lower grade personnel.
- Operates and monitors facility systems.
- Maintains accurate records of facility operation, maintenance activities, and equipment performance.
- Assists trainees by giving oral checkouts on general qualification topics. Supervises operator trainees on training watches and during performance of practical factors.

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- Reviews and comments on proposed revisions to operating instructions, emergency procedures, and training documents.
- Provides feedback to operations supervisor on system malfunctions, abnormalities, or unusual trends in system performance.
- Provides recommendations on troubleshooting plant problems.
- Performs RCRA tank system/container storage area inspections.

3.1.3 Emergency Responders – Fire Fighters

Provide hands-on response to fire and explosions involving all MFC facilities, including the TSD facilities as well as providing response to significant releases of hazardous material.

3.2 TSDF Support Personnel

Performs periodic work assignments at the HWMA units that does not involve unsupervised opening a container or transferring contents of a tank.

3.2.1 Equipment Operator

- Performs driving assignments to transport materials and equipment on and offsite.
- Operates mobile and fixed equipment and performs rigging assignments to move, place, build, and/or dismantle material, equipment, and fixtures, and excavate, backfill, and grade for underground utility installation removal or repair.
- Loads and secures shipping casks containing radioactive material and hazardous materials containers on transport vehicles and operates vehicles to deliver shipments to MFC and other INL locations.
- Operates various types of material handling equipment (such as mobile cranes, bridge cranes, forklifts, and manual and powered hoisting equipment) to lift, move, and place items as required.
- Operates various types of earth moving equipment (such as road graders, backhoes, end loaders, and dozers) to excavate, backfill, grade, and move earth and snow as required.

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- Inspects objects to determine weight, center of gravity, rigging method, and route of movement. Selects and attaches rigging tackle to minimize the likelihood of damage to objects or injury to personnel.
- Inspects and load tests rigging tackle and hoisting equipment and attaches certification tags. Maintains records of rigging and equipment maintenance and tests.

3.2.2 Health Physics Technician

- Provides radiological protection of personnel, facilities, and equipment
- Provides radiological assistance for INL or personnel emergencies, including first aid
- Completes and evaluates routine radiation safety surveillance of HWMA units. Maintains accurate records of daily health physics activities
- Ensures proper operation of radiation/contamination monitoring equipment
- Maintains cognizance of HWMA unit work procedures to ensure radiological control and to ensure that HWMA units conform with sound ALARA principles
- Evaluates radiological impacts of operational facility systems
- Provides radiological evaluation and monitoring of facility handling of radioactive material
- Familiar with DOT radioactive materials shipping regulations and requirements of shipping and receiving radioactive materials at HWMA units
- Maintains health physics training and qualifications required by DOE and MFC requirements
- Trains lower grade and lesser qualified HPTs.

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3.2.3 LSSS/Maintenance Technician/Backshift Inspectors

- Performs maintenance, repairs, and modifications to plant electrical, mechanical or fire protection system and components
- Performs routine preventive maintenance activities and specific maintenance to support HWMA unit operations
- Troubleshoots and repairs malfunctioning mechanical and electrical equipment
- Performs preparation, installation, inspection, and checkout work for changes to electrical, mechanical, or fire protection systems
- Trains lower grade and lesser qualified technicians
- Performs daily inspections of permitted tanks/tank areas in EBR-II, SCMS, and SPF.

3.2.4 Emergency Action Managers

- Emergency response duties for all imminent or actual emergency situations at MFC HWMA units
- Coordinates all MFC HWMA unit emergency response measures to safely and effectively mitigate the situation/emergency and commits the resources needed to carry out contingency plans
- Performs required immediate notifications as applicable
- Ensuring designated emergency response equipment is returned to service in a clean and operable condition.

4. TRAINING RECORDS MANAGEMENT

Records that document successful completion of required training for HWMA unit personnel will be maintained in the INL TRAIN data base, the INL Training Records Center, or MFC Training Records Center.

Worker qualification/training needs notices are initiated by the TRAIN system and tracked by the employee's training coordinator. Training records for each affected individual will be updated upon successful completion of required training. For current HWMA unit operations and support personnel, individual training records will be maintained for at least three years.

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For HWMA/RCRA unit operations and support personnel who terminate employment or are reassigned to another job classification at MFC, individual training records will be maintained for at least three years following the date of termination/reclassification. (IDAPA 58.01.05.008 40 CFR 264.16[d][4] and [e])

Job specific briefings are documented as appropriate on work orders, plan of the day attendee lists, or briefing forms retained within the work package. Briefings conducted as part of the TSD Facility Access Tour are maintained in individual training records.

5. REFERENCES

2964, "Idaho Hazardous Waste Management Act"

40 CFR 270.14(b)(12), EPA Administrated Permit Programs: the Hazardous Waste Permit Program; Permit Application

40 CRFR 264.16, "Personnel Training"

42 USC s/s 6901 et seq (1976) Resource Conservation and Recovery Act

Form 325.01, "Employee Position Description"

IDAPA 58.01.05.008, "Rules and Standards for Hazardous Waste; Identification and List of hazardous Waste"

IDAPA 58.01.05.012, "Rules and Standards for Hazardous Waste; Hazardous Waste Permit Program"

LWP-9201, "Briefings"

LWP-12003, "Individual Training Plans"

LWP-12033, "Personnel Qualification and Certification"

Manual 12, "Training and Qualification"

PDD-1004, "Integrated Safety Management System"

PER-116, "HWMA RCRA Storage and Treatment Permit for the Argonne National Laboratory-West on the Idaho National Engineering and Environmental Laboratory"

Standard for Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities

6. APPENDIXES

None.